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I believe the elimination of CW testing for all license classes is not the best course of action. At its most important, it applies to Part 97, Subpart A.

"Recognition and enhancement of the value of the amateur service to the public as a voluntary noncommercial communication service, particularly with respect to providing emergency communications."

Many modes can be used to carry emergency traffic, but CW has proven itself to be able to make it through where other modes can't. Dropping CW testing doesn't stop amateurs from using it, but many only learned it to upgrade their license class and found a special love for it. Others do not use it once they upgrade but they will still be far more able to assist if they receive a weak CW distress signal.

The simple truth is that learning CW at 5wpm per the current requirements isn't a barrier. Once you have learned all the characters (which takes a few hours total) most can copy 5wpm easily. It is only a barrier to those that wish to make it one. If you look at the number of complaints about learning CW and then look at the total number of licensees from the beginning to now that learned and passed the code testing requirement (at up to 20wpm no less), it is easy to see it didn't and doesn't pose a barrier to anything.

That said, I believe the license structure should be revised to allow for a no code entry level license with some HF access. This removes the "barrier" many complainants refer to and at the same time, retain the code for General and Extra at 5wpm. Thus preserving a long standing tradition and retaining a pool of licensees that know CW in the event of an emergency that requires it.

Thank you for reading my comment. I hope whatever decision is made is to the benefit of the service.

Sincerely,
Thomas Davis